

# GIOCONDA

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**Re: Freeplay Music LLC v. Sportsbrand Media Group, et al.,**  
**1:10-CV-0635 (SAS)**

February 17, 2011

**By Facsimile**

Honorable Shira A. Scheindlin  
United States Federal District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

Your Honor:

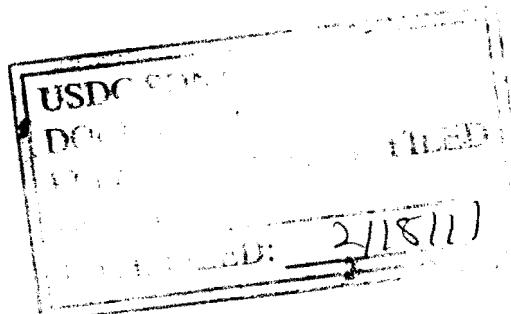
Plaintiff's request for an extension of fact discovery until April 28, 2011 is hereby granted. The final pre trial conference will therefore be held on May 3, 2011 at 4:30 pm. No further extensions will be granted. SO ORDERED.

We represent the Plaintiff Freeplay Music LLC in the above-captioned case. For the last several months, all of the parties have been exchanging fact discovery, as well as simultaneously <sup>4/17/11</sup> *Shira A. Scheindlin* *vs DJ* engaging in settlement discussions in a good faith attempt to resolve this matter.

The Scheduling Order that was entered by the Court on June 8, 2010 sets the end of fact discovery on February 28, 2011. No trial date has been set by the Court.

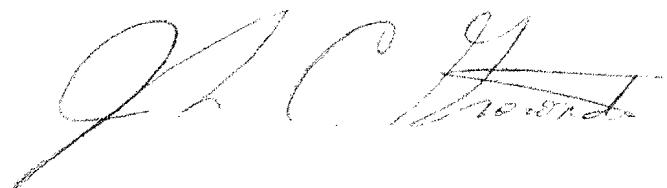
Freeplay requests a brief sixty-day extension of the fact discovery cutoff date, until April 28, 2011. The Defendants do not oppose this request, which is the first request for an extension of fact discovery in this matter. During this period, the parties will continue to exchange fact discovery, as well as continue to engage in settlement discussions with the hope of resolving this matter.

Thank you, Your Honor.



Respectfully Submitted,

The Gioconda Law Group PLLC



Joseph C. Gioconda

cc: Mark Mutterperl, Esq. (by e-mail);  
Charles Baker, Esq. (by e-mail); and  
Robert Gage, Esq. (by e-mail).